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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ALISON MULLANEY, an individual,

Plaintiff,

vs.

THE TRAVELERS INDEMNITY COMPANY a
foreign Corporation; DOES I through X,
inclusive; and ROE CORPORATIONS I through
X, inclusive,

Defendants.

Case No.: 2:23-cv-01530-JAD-BNW

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

[SECOND REQUEST]

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Alison Mullaney (“Plaintiff”), and Defendant The Travelers Indemnity Company (“Defendant”) by and through their undersigned counsel of record, stipulate to extend the un-expired discovery deadlines by thirty (30) days pursuant to LR IA 6-1, LR IA 6-2, and LR 26-3. This stipulation is made in good faith and not for purposes of delay.

I. DISCOVERY COMPLETED

1. On October 16, 2023, the parties participated in a Rule 26(f) conference.
2. On November 17, 2023, Plaintiff served her first set of requests for admission, requests for production of documents, and interrogatories to Defendant, and Defendant served its responses to each on January 2, 2023.
3. On December 26, 2023, Plaintiff served her initial disclosures.

1 4. On January 10, 2024, Defendant served its initial disclosures.

2 5. On February 13, 2024, Plaintiff conducted the deposition of Valerie Vo, who was
3 designated as the FRCP 30(b)(6) representative for certain topics of Defendant. The parties agreed
4 that Defendant would produce Mary C. Liparulo, RN, as a witness to address the additional topics
5 contained within the FRCP 30(b)(6) deposition notice at a later date.

6 6. On March 7, 2024, Defendant served their first set of requests for requests for
7 production of documents, and interrogatories to Plaintiff, and Plaintiff's responses are due on April 8,
8 2024.

9 7. On March 7, 2024, Defendant served their Notice Of Taking Remote Deposition Of
10 Plaintiff, Alison Mullaney.

11 8. On March 7, 2024, Defendant served their Notice Of Taking Remote Deposition Of
12 Plaintiff's Retained Expert Of Dr. Raimundo Leon Pursuant To Deposition Subpoena And Request
13 For Production Of Documents At Time Of Deposition.

14 9. The parties are in the process of scheduling the FRCP 30(b)(6) deposition on the
15 additional topics but may not have the deposition completed before the initial expert disclosure
16 deadline of April 1, 2024. Therefore, the parties are requesting an additional thirty day (30) extension
17 to the pending discovery deadlines to complete this deposition so that they may disclose expert
18 witnesses.

19 10. The parties have continued to meet and confer on various written discovery issues and
20 are working to resolve as many as possible without involving the Court.

21 11. To that end, the parties have had multiple phone calls on January 5, 2024, January 12,
22 2024, and January 23, 2024, to meet and confer, discuss discovery requests and responses, and obtain
23 witness availability for conducting depositions.

24 12. On March 5, 2024, Plaintiff's served her first supplement to initial disclosures.

25 **II. DISCOVERY THAT REMAINS TO BE COMPLETED AND REASONS**
26 **SUPPORTING THE REQUESTED EXTENSION**

27 1. Deposition of Plaintiff;

28 2. Deposition of Mary C. Liparulo, RN;

3. Deposition of Plaintiff's medical providers;

4. The parties will take the depositions of any and all other necessary witnesses as determined through discovery. The parties are coordinating on scheduling those depositions, along with any others;

5. The parties will issue and respond to any necessary additional written discovery; and

6. Any additional discovery as needed.

The reason for the requested extension has been the challenges encountered in securing availability of Nurse Mary Liparulo, who Defendant has agreed to produce as its FRCP 30(b)(6) deposition on certain medical related topics contained in the notice. The parties have been cooperating on discovery and on coordinating depositions, however, the depositions will not be able to be completed until later in March or possible in April, which will not give the parties enough time to get the information from the depositions to complete initial expert disclosures. As such, the parties are seeking a thirty (30) day extension on the discovery deadlines, which will allow the parties to take all necessary depositions and follow up with any necessary written discovery within the time frame of the extension.

III. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

	<u>Current Discovery Deadlines:</u>	<u>Proposed Discovery Deadlines:</u>
1. Discovery cut-off:	<u>May 29, 2024</u>	<u>June 28, 2024</u>
2. Amend /add parties:	<u>No change.</u>	<u>No change.</u>
3. Initial experts:	<u>April 1, 2024</u>	<u>May 1, 2024</u>
4. Rebuttal experts:	<u>April 29, 2024</u>	<u>May 29, 2024</u>
5. Dispositive motions:	<u>June 28, 2024</u>	<u>July 29, 2024</u>
6. Pretrial order:	<u>July 1, 2024</u>	<u>July 31, 2024</u>

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1 This is the parties' second stipulated request for extension of discovery deadlines. This request
2 for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it
3 is sought by the parties solely for the purpose of allowing sufficient time to finish necessary discovery.
4 The parties respectfully and mutually submit that the reasons set forth above constitute compelling
5 reasons for their requested extension.

6 DATED this 8th day of March, 2024.

DATED this 8th day of March, 2024.

7 **MAIER GUTIERREZ & ASSOCIATES**

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8 */s/ Joseph A. Gutierrez*

/s/ John R. Hanson

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15 **ORDER**

16 **IT IS SO ORDERED.**

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18 DATED: 3/12/2024

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UNITED STATES MAGISTRATE JUDGE